

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF OHIO
EASTERN DIVISION

FILED
RICHARD W. NAGEL
CLERK OF COURT
2017 MAY 25 PM 3:30
U.S. DISTRICT COURT
SOUTHERN DIST. OHIO
EAST. DIV. COLUMBUS

UNITED STATES OF AMERICA,

Plaintiff,

vs.

WILLIAM P. ELSCHLAGER,

Defendant.

CASE NO. _____
JUDGE

2 : 17 cr 108

INDICTMENT

Judge Watson

18 U.S.C. § 2261A(2)(B)

18 U.S.C. § 242

THE GRAND JURY CHARGES:

INTRODUCTORY ALLEGATIONS

1. At all times relevant to this Indictment, the defendant, **WILLIAM P. ELSCHLAGER**, was a Lieutenant with the Ohio State Highway Patrol and served from the Marietta, Ohio Post, within the Southern District of Ohio.

2. Over the course of his approximately nineteen-year employment, the defendant, **WILLIAM P. ELSCHLAGER**, received extensive training on the policies and procedures of the Ohio State Highway Patrol. At the time of his commission, the defendant, **WILLIAM P. ELSCHLAGER**, took an oath to uphold the United States Constitution, as well as the constitution and laws of the State of Ohio. As a Lieutenant with the Ohio State Highway Patrol, the defendant, **WILLIAM P. ELSCHLAGER**, was authorized by the laws of the State of Ohio to conduct traffic stops and searches and seizures.

COUNT 1

(18 U.S.C. § 2261A(2): Cyberstalking)

1. Paragraphs 1–2 of the Introductory Allegations of the Indictment are re-alleged and incorporated here.

2. Between on or about November 23, 2015, through and including January 17, 2016, in

the Southern District of Ohio and elsewhere, the defendant, **WILLIAM P. ELSCHLAGER**, with the intent to harass and intimidate, and place under surveillance with the intent to harass and intimidate another person, A.D.B. aka A.D.P., used an interactive computer service, an electronic communication service, an electronic communication service of interstate commerce, and facilities of interstate and foreign commerce, to engage in a course of conduct that caused, attempted to cause, and would reasonably be expected to cause substantial emotional distress to A.D.B. aka A.D.P.

All in violation of 18 U.S.C. § 2261A(2)(B).

COUNT 2

(18 U.S.C. § 242: Deprivation of Rights Under Color of Law)

1. Paragraphs 1–2 of the Introductory Allegations of the Indictment are re-alleged and incorporated here.

2. On or about December 14, 2015, in the Southern District of Ohio and elsewhere, the defendant, **WILLIAM P. ELSCHLAGER**, while acting under color of law, unlawfully conducted a traffic stop of A.D.B. aka A.D.P. after tracking her location via an unauthorized GPS tracking device that he had placed on her vehicle, willfully depriving her of the right, secured and protected by the Constitution and laws of the United States, to be free from unreasonable searches and seizures.

All in violation of 18 U.S.C. § 242.

A TRUE BILL

S/Foreperson

FOREPERSON

**BENJAMIN C. GLASSMAN
UNITED STATES ATTORNEY**



JESSICA H. KIM (0087831)
Assistant United States Attorney